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Of Attorneys for Plaintiff City of Portland

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

CITY OF PORTLAND, a municipal corporation of the State of Oregon,

3:14-cv-01958-SI

PLAINTIFF,

JOINT STATUS REPORT AND STIPULATED MOTION TO POSTPONE DEADLINES

v.

UBER TECHNOLOGIES, INC., a Delaware corporation, and **RASIER, LLC,** its wholly owned subsidiary,

DEFENDANTS.

Plaintiff City of Portland and defendants Uber Technologies, Inc. and Rasier, LLC ("Uber") submit this joint Status Report and Stipulated Motion to Postpone Deadlines.

JOINT STATUS REPORT

1. By Order dated entered on December 18, 2014, the parties were directed to file a Joint Status Report by March 18, 2015.

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- 2. On December 29, 2014, the parties filed a stipulated request to postpone deadlines and represented to the Court that the parties anticipated that it may be possible to reach a resolution of this case through the City's legislative and regulatory processes.
- 3. The parties represented that Uber had ceased operating the Uber application in the City of Portland.
- 4. The parties also requested that deadlines for actions, including responses to the Complaint and responses to requests for discovery, be postponed until fourteen (14) days after the submission of the Joint Status Report due March 18, 2015.
- 5. Based upon that stipulation, on December 29, 2014, this Court granted the stipulated request to postpone deadlines and ordered that the deadlines for actions, including responses to the Complaint and to requests for discovery, were postponed until fourteen (14) days after the submission of the Joint Status Report due March 18, 2015.
- 6. Since that time, the City of Portland has assembled the Private For-Hire Transportation Innovation Task Force that has been meeting regularly for the purpose of analyzing and evaluating changes to the private for-hire portions of the City Code with an emphasis on addressing issues related to transportation network companies like defendants Uber Technologies, Inc. and Raiser, LLC.
 - 7. The Task Force has met six times, including two community listening forums.
- 8. In addition, on March 12, 2015, the City Council passed an emergency ordinance adopting definitions for transportation network companies, vehicles and drivers and provisions requiring transportation network companies be validly permitted prior to operating in the City of Portland.
- 9. It is anticipated that interim rules will be adopted on or about April 9, 2015, and will remain in effect for 120 days. This additional time will allow the Private For-Hire

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Transportation Innovation Task Force to complete its work and recommend permanent Code changes to the Portland City Council.

10. It is anticipated that during this 120-day period following adoption of the interim rules, the permanent Code will be adopted by City Council.

STIPULATED MOTION TO POSTPONE DEADLINES AND SET A FURTHER JOINT STATUS REPORT

- As outlined above, the parties anticipate that it may be possible to reach a
 permanent resolution of the issues in this case through the City's legislative and regulatory
 processes.
- 2. In order to allow the parties to work toward ultimate resolution of the issues presented, the parties request that the Court set a deadline for an additional Joint Status Report 30 days following April 9, 2015, specifically on May 8, 2015.
- 3. The parties request that the deadlines for actions, responses, including responses to the Complaint and to requests for discovery, be postponed until 14 days after submission of the Joint Status Report due May 8, 2015.

s/ Tracy Reeve

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Dated: March 17, 2015

s/ Harry Korrell

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Dated: March 17, 2015

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